

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

**IN RE: VALSARTAN, LOSARTAN, :
AND IRBESARTAN PRODUCTS : Hon. Robert B. Kugler
LIABILITY LITIGATION :
: Civil No. 1:19-md-2875-RBK-
: JS**

This Document Relates to:

All Actions

**AUROBINDO PHARMA LTD.'S MOTION FOR PROTECTIVE ORDER
REGARDING THE DEPOSITION OF DR. A RAM MOHAN RAO AND
PRODUCTION OF HIS CUSTODIAL FILE**

Aurobindo Pharma Ltd., by and through its undersigned counsel, hereby files this Motion for Protective Order and states as follows:

1. In support of the instant motion, Aurobindo Pharma Ltd. will rely on its accompanying brief and proposed order.

Respectfully submitted,



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Attorneys for Aurobindo Pharma
USA, Inc., Aurolife Pharma, LLC, and
Aurobindo Pharma, Ltd.

Date: March 16, 2021